

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE EUROPEAN GOVERNMENT  
BONDS ANTITRUST LITIGATION

Case No. 1:19-cv-2601 (VM)  
Hon. Victor Marrero

**PLAINTIFFS' NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF STIPULATION  
AND AGREEMENT OF SETTLEMENT WITH BANK OF AMERICA, N.A., MERRILL  
LYNCH INTERNATIONAL, NATWEST MARKETS PLC, NATWEST MARKETS  
SECURITIES INC., NOMURA INTERNATIONAL PLC, UBS AG, UBS EUROPES SE, UBS  
SECURITIES LLC, CITIGROUP GLOBAL MARKETS INC., CITIGROUP GLOBAL  
MARKETS LIMITED, JEFFERIES INTERNATIONAL LIMITED,  
AND JEFFERIES LLC**

**PLEASE TAKE NOTICE** that Plaintiffs Ohio Carpenters' Pension Fund, Electrical Workers Pension Fund Local 103 I.B.E.W., and San Bernardino County Employees' Retirement Association (collectively, "Plaintiffs") will, and hereby do, move the Court pursuant to Federal Rule of Civil Procedure 23(e) for an order:

- (1) preliminarily approving the proposed settlement with Bank of America, N.A., Merrill Lynch International, NatWest Markets Plc and NatWest Markets Securities Inc., Nomura International plc, UBS AG, UBS Europe SE and UBS Securities LLC, Citigroup Global Markets Inc. and Citigroup Global Markets Limited, Jefferies International Limited, and Jefferies LLC;
- (2) approving proposed forms of notice to the proposed settlement class; and
- (3) authorizing notice as provided in the Order.

Submitted herewith in support of this motion are the:

- (1) Plaintiffs' Memorandum of Law in Support of Motion for Preliminary Approval of Stipulation and Agreement of Settlement with Bank of America, N.A., Merrill Lynch International, NatWest Markets Plc, NatWest Markets Securities Inc., Nomura International plc, UBS AG, UBS Europe SE, UBS Securities LLC, Citigroup Global Markets Inc., Citigroup Global Markets Limited, Jefferies International Limited, and Jefferies LLC; and

(2) Joint Declaration of Patrick Coughlin, Vincent Briganti, Gregory S. Asciolla, and Todd A. Seaver in Support of Plaintiffs' Motion for Preliminary Approval of Stipulation and Agreement of Settlement with Bank of America, N.A., Merrill Lynch International, NatWest Markets Plc and NatWest Markets Securities Inc., Nomura International plc, UBS AG, UBS Europe SE and UBS Securities LLC, Citigroup Global Markets Inc. and Citigroup Global Markets Limited, Jefferies International Limited, and Jefferies LLC;

Dated: July 26, 2024

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 26, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

*s/ Patrick Coughlin*  
Patrick Coughlin